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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
[Sacramento Division]**

AREZOU MANSOURIAN; LAUREN
MANCUSO; CHRISTINE WING-SI NG; and all
those similarly situated,

Plaintiff,

vs.

REGENTS OF THE UNIVERSITY OF
CALIFORNIA,

Defendant

CASE NO. S-03-2591 FCD EFB

**STIPULATED PROTECTIVE ORDER
REGARDING FINANCIAL
INFORMATION OF PLAINTIFFS**

Complaint filed: December 18, 2003
Judgment Date: April 23, 2008

1 Plaintiffs AREZOU MANSOURIAN, LAUREN MANCUSO, and CHRISTINE WING-
2 SI NG (“Plaintiffs”), and Defendant REGENTS OF THE UNIVERSITY OF CALIFORNIA
3 (“Defendant”) acknowledge and agree that Plaintiffs intend to file declarations in response to
4 Defendant’s Bill of Costs that contain financial information that is protected under the right to
5 privacy as provided by state and federal law, including Article I, section 1 of the California
6 Constitution.

7 Subject to and without waiving any objections to the discoverability of any information,
8 the parties stipulate that access to and use of such declarations and the information contained
9 therein shall be governed by the provisions of this Stipulated Protective Order, and that the terms
10 of the Stipulated Protective Order set forth herein may be entered by the Court. This Stipulated
11 Protective Order shall apply to copies, extracts, and summaries of designated documents.
12 Accordingly, Plaintiffs and Defendant, by and through their respective counsel of record, hereby
13 stipulate to the entry of the following Stipulated Protective Order regarding the disclosure of the
14 above stated documents and the information contained therein.

15 1 This Stipulated Protective Order covers documents containing information
16 designated by the any of the Plaintiffs as “Private Financial Information of Plaintiff,” including
17 but not limited to the declarations of Plaintiffs filed in response to Defendant’s Bill of Costs.

18 2. Records containing Private Financial Information of Plaintiff shall be so
19 designated by stamping copies of the document(s) produced to a party with the legend
20 “CONFIDENTIAL.” Stamping the legend “CONFIDENTIAL” on the cover of any multi-page
21 document shall designate all pages of the document as confidential, unless otherwise indicated
22 by the producing party.

23 3. Material designated as Private Financial Information of Plaintiff under this order,
24 the non-public information contained therein, and any summaries, copies, extracts, or documents
25 derived in whole or in part from materials designated as confidential (hereinafter “confidential
26 material”) shall be used only for the purpose of the prosecution, defense, or settlement of this

1 action and for no other purpose. Defendant, its counsel and its agents not shall disclose, release,
2 or otherwise publish any records containing Private Financial Information of Plaintiff or their
3 content except as necessary in this litigation.

4 4. Throughout this matter, excluding the presentation of evidence at time of trial,
5 confidential material produced pursuant to this Stipulated Protected Order may be disclosed or
6 made available only to the Court, to a party to this action, to counsel for a party (including the
7 paralegal, clerical, and secretarial staff employed by such counsel), and to the “qualified
8 persons” designated below:

- 9 a. Experts or consultants (together with their clerical staff) retained by
10 such counsel to assist in the prosecution, defense, or settlement of this
11 action;
12 b. Court reporters employed in this action;
13 c. A witness at any deposition or proceedings in this action; and
14 d. Any other person as to whom the parties agree in writing.

15 5. The portion of any deposition in which confidential materials are discussed shall
16 be taken only in the presence of qualified persons, as defined above.

17 6. Throughout this matter, excluding the presentation of evidence at time of trial,
18 any motion, application, petition, or the like, filed with the Court which includes any confidential
19 material shall be filed under seal.

20 7. The Parties agree that they will meet and confer, with the Court as necessary,
21 about the handling of material designated by any of the Plaintiffs as confidential produced
22 pursuant to this Stipulated Protected Order for trial purposes. Nothing herein shall be construed
23 as a concession by any Party that its presentation at trial of evidence relevant to its claims or
24 defenses should be restricted in any manner, including the financial information designated by
25 any of the Plaintiffs as Confidential.
26

1 8. Nothing herein shall impose any restrictions on the use or disclosure by a party of
2 material obtained by such party independent of discovery in this action, whether or not such
3 material is also obtained through discovery in this action, or from disclosing its own confidential
4 material as it deems appropriate. Receipt by any party of any confidential information, shall
5 neither be an admission or claim that the information is confidential information, as asserted by
6 the propounding party, nor an admission with respect to the authenticity, competency, relevance
7 or materiality thereof.

8 9. Nothing herein shall impose any restrictions on the use by the Parties of
9 confidential material produced pursuant to this Stipulated Protected Order to prosecute or defend
10 against any claim in this litigation, but rather solely governs the dissemination of said
11 information obtained in the context of this litigation.

12 10. This Stipulated Protective Order shall be without prejudice as to the rights of the
13 parties to: (1) bring before the Court at any time the question of whether any particular
14 document or information is confidential or whether its use shall be restricted; or (2) present a
15 motion to the Court for a separate protective order as to any particular document or information,
16 including restrictions different from those specified herein. This Order shall not be deemed to
17 prejudice the parties in any way in any future application for modification of this Order.

18 11. Neither anything in this Stipulated Protective Order nor the production of any
19 information or document under the terms of this Stipulated Protective Order nor any proceedings
20 pursuant to this Stipulated Protective Order, shall be deemed to have the effect of an admission
21 or waiver of objections or privileges by either party or of altering the confidentiality or non-
22 confidentiality of any such document or information, or altering of any existing right or
23 obligation of any party or the absence thereof.

24 12. This Stipulated Protective Order shall survive the final termination of this action
25 and the Court shall retain jurisdiction to resolve any dispute concerning the use of the
26 information disclosed hereunder. Documents covered by this Stipulated Protective Order shall

1 remain subject to this Stipulated Protective Order even after the conclusion of this case and may
2 be retained for as long as required by law and then destroyed.

3 13. This Stipulated Protective Order does not apply to any documents produced by
4 any party in discovery thus far which are not otherwise subject to a protective order.

5 **IT IS SO STIPULATED.**

6
7 Respectfully Submitted,

8 DATED: June 18, 2008

EQUAL RIGHTS ADVOCATES

9
10 By: /s/ Noreen Farrell
11 NOREEN FARRELL
Attorneys for Plaintiffs

12 DATED: June 18, 2008

THE STURDEVANT LAW FIRM
A Professional Corporation

13
14 By: /s/ Monique Olivier
15 MONIQUE OLIVIER
Attorneys for Plaintiffs

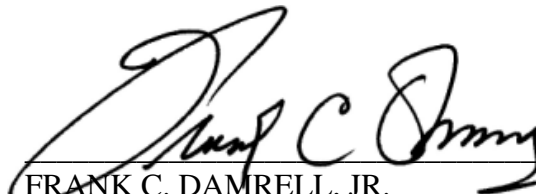
16 DATED: June 18, 2008

PORTER, SCOTT
A Professional Corporation

17
18 By: /s/ David Burkett
19 DAVID BURKETT
Attorneys for Defendant

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22 **IT IS SO ORDERED.**

23
24 Dated: June 18, 2008

25 
26 FRANK C. DAMRELL, JR.
UNITED STATES DISTRICT JUDGE